

CASE NO. 23-2176(L), 23-2284

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IN THE  
**United States Court of Appeals**  
FOR THE FOURTH CIRCUIT

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JULIE A. SU,  
Acting Secretary of Labor, United States Department of Labor,  
*Plaintiff - Appellee,*  
v.

MEDICAL STAFFING OF AMERICA, LLC, d/b/a Steadfast Medical  
Staffing, a limited liability company; LISA ANN PITTS, individually  
and as owner and officer of the aforementioned company,  
*Defendants - Appellants.*

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA AT NORFOLK

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ERRATA SHEET FOR OPENING BRIEF OF APPELLANTS

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The following clerical errors are being corrected in the Opening Brief of Appellants originally filed on February 1, 2024:

1. Table of Contents, roman numeral page ii, heading “I.” under “Argument” has been corrected to read:

**I. The District Court Misallocated the Burden of Proof on the Classification Issue, and in Turn Committed Clear Error on Key Findings of Fact.**

This change will match the text for the heading located on page 19 of the brief.

2. The word count on the brief was inadvertently not updated after final changes to the brief. It has been updated to read:

**13,648 words, including 650 additional words allowed by leave of the Court**

3. A space has been added between footnotes 4 and 5 on page 52.

Respectfully submitted,

/s/ Abram J. Pafford

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